



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCII  
GOVERNOR

DAWN R. GALLAGHER  
COMMISSIONER

April 15, 2004

Ms. Lisa Joy  
Environmental Director  
437 Huey Drive  
Naval Air Station  
Brunswick, Maine 04011

Re: Site 9 Institutional Controls  
Proposed Parking Lot Construction  
Brunswick Naval Air Station

Dear Ms. Joy:

The Maine Department of Environmental Protection (MEDEP) has reviewed the letter dated March 18, 2004, outlining the Navy's plan to construct an asphalt parking lot within the Institutional Control boundary for Site 9. The proposed parking lot will cover the footprint of the former Bachelors' Enlisted Quarters Building 216, west of the known Site 9 ash landfill and west of and adjacent to the groundwater plume. According to your letter the construction of the parking lot will require removing soil/fill to a depth of 1.5 feet below ground surface.

The Final Record of Decision for Site 9 (September 1999) establishes the Institutional Controls that prevents the disturbance of and contact with the contents of the inactive ash landfill without written approval from EPA and MEDEP and restricts the use of or contact with groundwater.

Based on the Draft Direct-Push Groundwater and Ash Landfill/Dump Area Delineation Investigation Summary Report for Site 9 (October 2003) the ash landfill extends more to the northwest than formerly believed and may extend under Building 217. However no soil borings were advanced west of Building 217 in the vicinity of the proposed project. The same study indicated that the waste material was as shallow as 4 feet below ground surface and deep as 19 feet below ground surface, and that the overlying material appeared to be unaffected by waste.

A review of MW-NASB-022 showed that it is a sentinel well which is outside the boundary of Site 9 and cross gradient to groundwater flow within Site 9. Therefore MEDEP reviewed the data for MW-NASB-80 which is part of the Long Term Monitoring Plan (LTMP) along with S-9-B-5 data from the recent direct push investigation (October 2003). These wells are downgradient from the proposed parking lot. MW-NASB-80 has a history of varying levels of vinyl chloride, 1,1 dichloroethane and 1,2 dichloroethene. However MW-NASB-80 lies within the known boundaries of the ash landfill and due to the distance from the upper northwest edge of the ash landfill, the source of the groundwater contamination is uncertain. S-9-B-5 had low levels of volatile organic compounds and chlorinated volatile organic compounds. There appears to be low potential for worker exposure to contaminated groundwater based on the depth of the proposed project (1.5 feet bgs) and the groundwater elevation in the vicinity of Building 217 (7 feet bgs).

Based on the proposal and a review of the available information, the Maine Department of Environmental Protection concurs that the proposed construction of a parking lot will have no discernible impact to the Site 9 Record of Decision remedy for soil or groundwater.

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MEDEP assumes that the Navy will inform the contractor selected for this project that the parking lot is on a Superfund site and of the potential risks. Also if during the demolition of Building 217 new information regarding Site 9 becomes available to the Navy, it is expected that EPA and MEDEP will be informed.

Thank you for the opportunity to review this matter. Please feel free to call me at (207) 287-7713 if you have any questions or comments.

Respectfully,

  
Claudia Sait  
Project Manager-Federal Facilities  
Bureau of Remediation & Waste Management

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